

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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:
UNITED STATES OF AMERICA : INDICTMENT
:
- v. - : 20 Cr. 367
:
STEVE HUNT, :
:
Defendant. :
:
----- x

COUNT ONE
(Conspiracy to Commit Hobbs Act Robbery)

The Grand Jury charges:

1. On or about March 2, 2020, in the Southern District of New York and elsewhere, STEVE HUNT, the defendant, and others known and unknown, unlawfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and would and did thereby obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), to wit, HUNT and others known and unknown agreed to rob an individual of the proceeds of certain unlawful activities affecting interstate commerce at an apartment in Mount Vernon, New York.

(Title 18, United States Code, Section 1951.)

COUNT TWO
(Hobbs Act Robbery)

The Grand Jury further charges:

2. On or about March 2, 2020, in the Southern District of New York, STEVE HUNT, the defendant, unlawfully and knowingly did commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and did thereby obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), to wit, HUNT attempted to rob an individual of proceeds of certain unlawful activities affecting interstate commerce at an apartment in Mount Vernon, New York, and aided and abetted the same.

(Title 18, United States Code, Sections 1951 and 2.)

COUNT THREE
(Brandishing a Firearm)

The Grand Jury further charges:

3. On or about March 2, 2020, in the Southern District of New York and elsewhere, STEVE HUNT, the defendant, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, namely, the Hobbs Act robbery charged in Count Two of this Indictment, knowingly did use and carry a firearm, and, in furtherance of such crime, did possess a firearm, and did aid and abet the use, carrying and possession of a firearm, which firearm was brandished during the robbery

charged in Count Two of this Indictment.

(Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2.)

FORFEITURE ALLEGATION

4. As a result of committing the offenses alleged in Counts One and Two of this Indictment, STEVE HUNT, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28 United States Code, Section 2461(c), any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of said offenses, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offenses.

Substitute Assets Provision

5. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 981; Title 21, United States Code, Section 853; and Title 28, United States Code, Section 2461.)

Lionie Boulton
FOREPERSON

Audrey Strauss
AUDREY STRAUSS
Acting United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

STEVE HUNT,

Defendant.

SEALED INDICTMENT

20 Cr. 367

(18 U.S.C. §§ 1951, 924(c)(1)(A)(ii)
and 2.)

AUDREY STRAUSS
Acting United States Attorney


Leonie O'Boyle
Foreperson
